

MULLIN HOARD & BROWN, L.L.P.

David R. Langston, SBN: 11923800

Brad W. Odell, SBN: 24065839

P.O. Box 2585

Lubbock, Texas 79408-2585

Telephone: (806) 765-7491

Facsimile: (806) 765-0553

drl@mhba.com

bodell@mhba.com

*Counsel for Debtors, Reagor-Dykes*

*Motors, LP; Reagor-Dykes Imports, LP;*

*Reagor-Dykes Amarillo, LP; Reagor-Dykes*

*Auto Company, LP; Reagor-Dykes*

*Plainview, LP; Reagor-Dykes Floydada, LP*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

<b>IN RE:</b>	§	
	§	
<b>REAGOR-DYKES MOTORS, LP</b>	§	<b>Case No. 18-50214-rlj11</b>
	§	
<b>Debtor.</b>	§	

---

<b>IN RE:</b>	§	
	§	
<b>REAGOR-DYKES IMPORTS, LP</b>	§	<b>Case No. 18-50215-rlj11</b>
	§	
<b>Debtor.</b>	§	

---

<b>IN RE:</b>	§	
	§	
<b>REAGOR-DYKES AMARILLO, LP</b>	§	<b>Case No. 18-50216-rlj11</b>
	§	
<b>Debtor.</b>	§	

---

<b>IN RE:</b>	§	
	§	
<b>REAGOR-DYKES AUTO COMPANY, LP</b>	§	<b>Case No. 18-50217-rlj11</b>
	§	
<b>Debtor.</b>	§	

---

<b>IN RE:</b>	§	
	§	
<b>REAGOR-DYKES PLAINVIEW, LP</b>	§	<b>Case No. 18-50218-rjl11</b>
	§	
<b>Debtor.</b>	§	

**IN RE:**

**REAGOR-DYKES FLOYDADA, LP**

**Debtor.**

§  
§  
§  
§  
§

**Case No. 18-50219-rlj11**

**DEBTORS' MOTION FOR JOINT ADMINISTRATION**

TO THE HONORABLE ROBERT L. JONES, U.S. Bankruptcy Judge:

NOW COMES, Reagor-Dykes Motors, LP, Reagor-Dykes Imports, LP, Reagor-Dykes Amarillo, LP, Reagor-Dykes Auto Company, LP, Reagor-Dykes Plainview, LP, and Reagor-Dykes Floydada, LP (each a "Debtor," and collectively, the "Debtors") the Debtors in the above-referenced bankruptcy proceedings, and file this their Motion For Joint Administration of their Chapter 11 bankruptcy cases, and in support of such Motion would respectfully show the Court as follows:

**I.**

Pursuant to 11 U.S.C. § 302 and Bankruptcy Rule 1015 the Debtors wish to consolidate their bankruptcy cases under the above-referenced case REAGOR DYKES MOTORS, LP (Case No.18-50214) as the lead case. This request for consolidation is to allow for a joint administration of all six cases. The Debtors would submit that this Motion is filed in good faith and is in the best interest of all of the parties.

**II.**

The Debtors are all affiliates of the Reagor Dykes Auto Group. The Debtors would submit that Bankruptcy Rule 1015 allows for the joint administration of these estates. The Debtors would further show that the majority of the creditors are the same in all cases and there is little or no potential for a conflict of interest.

**III.**

The Debtors submit that granting its Motion For Joint Administration of their cases would be more convenient for all parties in interest and creditors of all six estates. The Debtors would like to propose a joint Chapter 11 Plan of Reorganization to the creditors of all six estates.

WHEREFORE, PREMISES CONSIDERED, Reagor-Dykes Motors, LP, Reagor-Dykes Imports, LP, Reagor-Dykes Amarillo, LP, Reagor-Dykes Auto Company, LP, Reagor-Dykes Plainview, LP, and Reagor-Dykes Floydada, LP pray for an Order of the Court Approving its Motion For Joint Administration of their cases, and asks for such other relief at law or equity to which it may show itself justly entitled.

Respectfully Submitted,

MULLIN HOARD & BROWN, L.L.P.  
P.O. Box 2585  
Lubbock, Texas 79408-2585  
Telephone: (806) 765-7491  
Facsimile: (806) 765-0553

/s/ David R. Langston  
David R. Langston, SBN: 11923800  
Brad W. Odell, SBN: 24065839  
***Counsel for Debtors, Reagor-Dykes  
Motors, LP; Reagor-Dykes Imports, LP;  
Reagor-Dykes Amarillo, LP; Reagor-Dykes  
Auto Company, LP; Reagor-Dykes  
Plainview, LP; Reagor-Dykes Floydada,  
LP***

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion was served on the following parties in interest via ECF and/or regular U.S. Mail on this 3<sup>rd</sup> day of August, 2018:

1. Reagor Dykes Auto Group  
1215 Ave. J  
Lubbock, Texas 79401
2. U.S. Trustee's Office  
1100 Commerce St., Room 9C60  
Dallas, Texas 75242
3. All parties receiving notice via ECF in this case.

/s/ David R. Langston  
David R. Langston